

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): September 14, 2020
2. Deadline for first request for production of documents and first request for interrogatories: October 22, 2020
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) 0 ; defendant(s) 0
3. Date for completion of any joinder of additional parties and amendment of the pleadings: October 5, 2020
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 0 ; defendant(s) 0
4. Number of depositions by plaintiff(s) of: 2-3 per Defendant parties ; non-parties 1-2
5. Number of depositions by defendant(s) of: 1 Plaintiff parties ; non-parties 4-5
6. Date of status conference (joint status report due two business days in advance): March 11, 2021
7. Date for completion of factual discovery: April 12, 2021
8. Are expert witnesses needed? Yes X No
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical      ; non-medical 2
- 8(b). Date for completion of those expert reports: May 10, 2021
- 8(c). Number of expert witnesses, if any, of defendant(s): medical      ; non-medical 2 per Defendant
- 8(d). Date for completion of those expert reports: May 10, 2021
9. Date for completion of expert discovery: June 28, 2021
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): September 23, 2021
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Summary Judgment  
August 30, 2021

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: Judgment on the Pleadings, November 16, 2020  
Summary Judgment September 30, 2021
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes X No
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes      No X
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes      No X